

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

CHARLES LEACH, on behalf of himself and
all others similarly situated,

Plaintiffs,

v.

HONEYWELL INTERNATIONAL INC., a
Delaware corporation,

Defendant.

Case Number: 1:14-CV-12245-LTS

**PLAINTIFFS' UNOPPOSED MOTION
FOR FINAL APPROVAL OF CLASS
ACTION SETTLEMENT**

Plaintiffs Charles Leach, Scott Johnsen, Derek Scott, Robert Burke, and Mark Riley (“Plaintiffs”) respectfully move the Court for final approval of the Settlement Agreement (“Agreement”) entered into between the Plaintiffs and Honeywell International Inc. and for final certification of the class for settlement purposes. *See* Ex. A, Class Action Settlement Agreement and Release. On April 14, 2017, this Court preliminarily granted approval of the Agreement and certified the class for settlement purposes. Order Granting Motion for Preliminary Approval of Class Certification (“PAO”) [Dkt. 97]. Plaintiffs are also filing, contemporaneously herewith, their Unopposed Motion for Award Of Attorneys’ Fees, Litigation Expenses, and Incentive Awards.

In support of their request, Plaintiffs assert, *inter alia*, that the Agreement proposed for final approval is fair, reasonable, and adequate and that the proposed Settlement Class meets the requirements for certification under Fed. R. Civ. P. 23. To the extent objections are or have been filed, they are unsupported, without legal or factual merit, and should be overruled. Plaintiffs will

file a separate memorandum, in accordance with the schedule entered by this Court in the PAO, addressing any objections.

In further support of this Motion, Plaintiffs refer the Court to their Memorandum in Support of Motion for Final Approval of Class Action Settlement, the accompanying declarations, submitted herewith, and all documents filed of record in this matter. Defendant does not oppose the relief requested in this Motion. A proposed agreed Final Approval Order, Final Judgment, and Order of Dismissal with Prejudice is attached hereto.

WHEREFORE, Plaintiffs respectfully request this Court grant this Motion for Final Approval of Class Action Settlement, finalize certification of the class for settlement purposes and enter the proposed Final Approval Order, Final Judgment, and Order of Dismissal with Prejudice to fully resolve the issues in Plaintiffs' Consolidated Amended Class Action Complaint.

Dated: July 25, 2017

Respectfully submitted,

/s/ Charles J. LaDuca

Charles J. LaDuca

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Counsel for Plaintiffs and the Settlement Class

LOCAL RULE 7.1 CERTIFICATE

I hereby certify pursuant to Local Rule 7.1(a)(2) that the moving party has conferred in good faith with opposing counsel on the matter set forth herein and that opposing counsel does not oppose the relief sought herein.

/s/ Charles J. LaDuca

Charles J. LaDuca

CERTIFICATE OF SERVICE

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing and paper copies will be sent via U.S. first class mail to those indicated as non-registered participants, this 25th day of July, 2017.

/s/ Charles J. LaDuca

Charles J. LaDuca